



NORTH DAKOTA
DEPARTMENT of HEALTH

ENVIRONMENTAL HEALTH SECTION
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November 14, 2011

Via U.S. and Electronic Mail

FILE

Mr. Carl Daly
Director, Air Program
U.S. EPA, Region 8
1595 Wynkoop Street
Denver, CO 80202-1129

Re: Coal Creek NO_x BART Determination

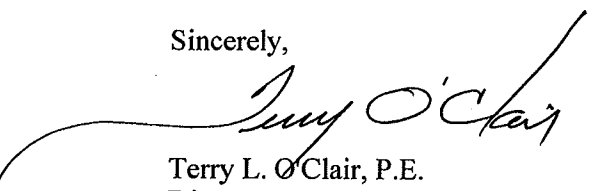
Dear Mr. Daly:

I am writing to advise EPA Region 8 concerning developments associated with the North Dakota Regional Haze State Implementation Plan (Regional Haze SIP). As you know the Regional Haze SIP was submitted to EPA in March 2010 with a supplement submitted on July 27, 2010. EPA determined that the North Dakota SIP submittal was complete in April 2010. North Dakota subsequently submitted an Amendment to its Regional Haze SIP.

On July 15, 2011, Great River Energy (GRE) advised the Department that it had re-evaluated certain aspects of its previously submitted BART Emission Control Analysis for its Coal Creek Station (CCS). The Department had utilized and relied upon GRE's submittal in conducting its BART Determination for CCS. Specifically, GRE advised the Department that its original submittal of the cost data for selective non-catalytic reduction (SNCR) contained erroneous data. The Department has completed an initial investigation of this circumstance and determined that these errors materially and adversely affect the Department's BART assessment and determination for the CCS. Based upon the above circumstance, the Department has recently notified GRE that the Department has initiated a reevaluation of the CCS BART determination. The Department has also notified GRE that it must submit any supplemental information to the Department by December 21, 2011 (see attachment). EPA should thus be aware that these efforts may result in an amendment to the State of North Dakota's Regional Haze SIP, as these issues remain under the primary responsibility and authority of the Department.

If you have any questions, please feel free to contact me.

Sincerely,


Terry L. O'Clair, P.E.
Director
Division of Air Quality

TLO/TB:saj
cc: Mary Jo Roth, Great River Energy